

**Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233**

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, MB Docket No. 04-233.

Received & Inspected
MAR 2 5 2008
FCC Mail Room

Any new FCC rules, policies or procedures must not violate First Amendment rights. Any number of proposals discussed in the NPRM, if enacted, would do so – and must not be adopted.

- (1) The FCC must not force radio stations, especially religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.
- (2) The FCC must not turn every radio station into a public forum where anyone and everyone has rights to air time. Proposed public access requirements would do so – even if a religious broadcaster conscientiously objects to the message. The First Amendment forbids imposition of message delivery mandates on any religion.
- (3) The FCC must not force revelation of specific editorial decision-making information. The choice of programming, especially religious programming, is not properly dictated by any government agency – and proposals to force reporting on such things as who produced what programs would intrude on constitutionally-protected editorial choices.
- (4) The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.
- (5) Many Christian broadcasters operate on tight budgets, as do many smaller market secular stations. Keeping the electricity flowing is often a challenge. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. Raising costs with these proposals would force service cutbacks – and curtailed service is contrary to the public interest.

We urge the FCC not to adopt rules, procedures or policies discussed above.

Beth Crawford

3/18/08
Date

Signature

Beth Crawford

248 Snow Hill Lane Elk Park NC 28822
Address

Name

Title (if any)

Organization (if any)

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Signature

John Stewart
Name

3-19-08
Date

479 Clark Ave.
Address

417-533-7252
Phone

Reverend
Title (if any)

Lynchburg Baptist Church
Organization (if any)

THE SERVICES DIVISION

Received & Inspected

MAR 25 2008

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Fred Crawford

Signature

3-16-08

Date

Fred Crawford

Name

Address

Phone

Title (if any)

Organization (if any)

RECEIVED
FEDERAL COMMUNICATIONS DIVISION

Received & Inspected

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Clyde E. Adams

Signature

3-18-2008
Date

1434 Rock Creek Rd
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Address

Clyde E. Adams

Name

336-696-7846
Phone

Title (if any)

Organization (if any)

Rulemaking

2009 MAR. 25 P 2:50 ECC Mail Room

FCC Mail Room
This is a number of

- ally religious, broadcast
sed advisory board pro

Phyllis B. Sellers
William J. Sellers

Date March 19, 2008

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Address 16635

1-814-695-9285
Phone

Organization (if any)

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Judy Hendrix

Signature

3.10.08

Date

Judy Hendrix

Name

PO Box 2593, Statesboro, GA

Address

30459

912-489-3727

Phone

Title (if any)

Organization (if any)

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Thomas D. Stalnaker

Signature

3-18-08

Date

Thomas D. Stalnaker

Name

125 H. Bridge Circle

Address Lewistown PA 17044

(717) 242-8511

Phone

Title (if any)

Organization (if any)

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Lisa Stainaker

Signature

3/16/08

Date

LISA STAINAKER

Name

125 HIBRIDGE CIRCLE
Address LEWISTOWN PA 17044

717-242-8511

Phone

Title (if any)

Organization (if any)



CLEAR CHANNEL RADIO

WDFN-AM • WDTW-FM • WJLB-FM • WKQI-FM • WMXD-FM • WNIC-FM • WXDX-AM

COMMUNICATIONS SERVICES DIVISION

2008 MAR 25 P 2:59

March 18, 2008

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Received & Inspected

MAR 25 2008

FCC Mail Room

RECEIVED

In the Matter of Broadcast Localism (MB Docket No. 04-233)

Dear Chairman Martin,

On behalf of Clear Channel Radio Detroit, I am writing to inform you of the incredible support our radio group offers to our community. Our Detroit radio group, which includes WDFN-AM, WDTW-AM, WNIC, WDTW, WJLB, WKQI, and WMXD is proud to go well beyond the rules mandated by the FCC.

Since January, our radio group has supported the National Ad Council by running hundreds of PSA announcements on "home foreclosures"... a major issue in the Detroit area. The PSA campaign offers information on how impacted listeners can get help before they lose their homes. In addition, we also have been proud sponsors of the Goodwill...who are currently raising awareness with the Goodwill Motor City Bowl-A-Thon, which helps our Metro Detroit neighbors, family and friends get back to work through, education, on the job training and skill development. In 2007, Goodwill provided 13,753 individuals with employment and training services in Southeast Michigan, of course we would like to see that number increase by the thousands in 2008.

Clear Channel Radio Detroit is also the radio partner for Race For The Cure...a breast cancer awareness walk held by the Karmanos Cancer Institute in downtown Detroit every year. This year the event will be held May 31, 2008 and is expected to draw more than 30,000 people and raise more than one million dollars for breast cancer research. The radio group begins to air hundreds of PSA announcements and place information, with the opportunity to register for the walk, on their websites beginning as early as February 1st. In addition, each station has an air personality or multiple personalities that have volunteered their time to be a "breast cancer champion" and appear at events related to the walk, as well as appear the day of the event to do meet n' greets, stage announcements, cheer on walkers, and much more.

Our community support for 2008 has only begun and we have several other events that happen throughout the year...including an award nominated radiothon benefiting the Leukemia and Lymphoma Society of America, Aids Walk Detroit, Coats For Kids, the Salvation Army Red Kettle Campaign, and many more.

It is our pleasure and responsibility to support our community. I ask that the FCC not impose any rules that will hamper our ability to perform these very important and valuable services.

Sincerely,

Til Levesque

Til Levesque
President/Market Manager
Clear Channel Radio Detroit

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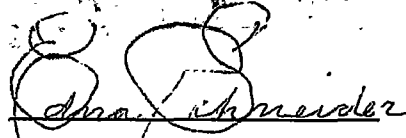
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We urge the FCC not to adopt rules, procedures or policies discussed above.



Signature

3/14/08
Date

Henry E. Schneider

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240644 Co. Rd. T, Dering, NE
Address
69341

308-436-2467
Phone

Title (if any)

Organization (if any)

MAR 25 2008

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FCC Mail Room

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JK Broome

Signature

JK Broome

Name

3/08/08
Date

Monroe NC
Address

unlisted
Phone

Title (if any)

Organization (if any)

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Signature

3-13-08
Date

SEAN PARKS
Name

161 REDWOOD DR. RICHMOND, KY 40475
Address

859-661-1374
Phone

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Kathy Mankey

Signature

KATHY MANKEY

Name

Title (if any)

Organization (if any)

3-19-08

Date

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We urge the FCC not to adopt rules, procedures or policies discussed above.

Janice L. Henson
Signature

3-19-08
Date

JANICE L. HENSON
Name

10021 Ct. Rd. 8490 Newburg, Mo. 65550
Address

573-762-2867
Phone

Title (if any)

Organization (if any)

Save Christian Radio

RESULT: Now, it is possible to serve several missions from one location. But under this proposal, many co-location arrangements would be forced to end — raising daily operating costs and imposing immediate expenses related to moving, construction of other facilities and overseeing forced relocations.

RESULT: When coupled with the rapidly rising costs of broadcasting, including multiplying electricity expenses, extended staffing requirements and forced relocations will leave some Christian Broadcasters with little choice: either cut back or give up.

The First Amendment protects the free exercise of religion. The government must not be allowed to impose rules that violate it. Christian Radio needs your support now to keep its message of salvation strong on the nation's airwaves. It's not just a Christian thing — everyone's fundamental constitutional rights are at stake.

HERE'S WHAT YOU CAN DO:

The FCC is taking comments on these proposals. You can add your comments to the record. The FCC can only make rule changes based on evidence — and the evidence you submit can make a difference!

By Mail: Send a letter, specifying what the FCC must not do and why. Make sure you place the docket number on top of the letter to be sure it is delivered to the correct office:

MB Docket No. 04-233; Comments in Response to Localism Notice of Proposed Rulemaking.

Mail your comments, so they arrive by April 14, 2008 to

Using the US Postal Service:

The Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Attn: Chief, Media Bureau.

Or using FedEx, UPS, DHL or similar services:

The Secretary

Federal Communications Commission

9300 East Hampton Drive

Capitol Heights, MD 20743

Attn: Chief, Media Bureau

By Internet: Visit <http://www.savechristianradio.com> for easy step-by-step comment submission assistance.

You can also write to your Senators and Congressman. Tell them that freedom of religion and freedom of speech are threatened. Describe the problematic FCC proposals and the harm they will cause, if they are adopted. For help locating your Senators and Congressman — visit <http://www.savechristianradio.com>

Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233

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We urge the FCC not to adopt rules, procedures or policies discussed above.

Cecilia A. Stewart

Signature

CECILIA A STEWART

Name

Title (if any)

Organization (if any)

3/19/08
Date

479 CLARK AVE
Address

417-533-7252
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MAR 25 2008

Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233

FCC Mail Room

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We urge the FCC not to adopt rules, procedures or policies discussed above.

Martha Sue Bauguess

Signature

3-18-2008

Date

1432 Rock Creek Rd

Ni. Wilkesboro NC 28659

Address

MARTHA SUE BAUGUESS

Name

336-696-2494

Phone

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Organization (if any)

2008 SERVICES DIVISION

Received & Inspected
MAR 25 2008
FCC Mail Room

**Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233**

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We urge the FCC not to adopt rules, procedures or policies discussed above.



Signature

15-Mar-08

Date

Speech, Adrian

Name

1434 Rock Creek Road

Address

Phone

Title (if any)

Organization (if any)

MAR 25 2008

FCC Mail Room

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We urge the FCC not to adopt rules, procedures or policies discussed above.

Dallas Arnold

Signature

3/13/08

Date

Dallas Arnold

Name

159 Redwood Dr.

Address

Richmond Ky 40475

859-623-2852

Phone

Title (if any)

Organization (if any)



Lovett Broadcasting Enterprises, Inc.
P.O. Box 120
Cairo, GA 39828
www.wgra.net

2008 MAR 25 P 2:39
RECEIVED
DIVISION

March 18, 2008

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Received & Inspected

MAR 25 2008

FCC Mail Room

Re: Broadcast Localism Proceeding
MB Docket No. 04-233

Dear Ms. Dortch:

Station WGRA-AM has been serving our community of Grady County, Georgia since 1949. Next year will be our 60th Anniversary of being the "Voice of Grady County" and we are planning a big celebration of the great service provided to our community by WGRA Radio. Over the past 59 years, WGRA has devoted countless resources to serving our local community. Our Station ~~participates in our community, and~~ understands the needs of our community, not because of government mandates but because the Station cares about our community and serving the public interest. I write today to object to the burdensome and unnecessary proposals contained in the Commission's Broadcast Localism proceeding. Each of the proposals in the proceeding are addressed separately below.

Communications Between Licensees and Their Communities

More than 25 years ago, the FCC abandoned its misguided "ascertainment" requirements, when it correctly concluded that market forces, rather than government mandates, may be relied upon to ensure that broadcasters air programming that is responsive to the needs and interests of their communities. Nothing has changed in those 25 years that should make the FCC reach a different conclusion now. If anything, broadcasters today face far more competition, from satellite radio and TV, cable, the Internet, and iPods, to such an extent that market forces virtually ensure that broadcasters air responsive programming. We know full well how important it is to address the

needs and interests of the people in our communities. If we don't address those needs and interests, we know that market forces will drive listeners and viewers elsewhere. Government mandates will not change that equation, except to make it far more difficult and expensive to be a good broadcaster.

Accordingly, this Station opposes any reinstatement of the formal ascertainment process or the mandatory creation of advisory boards. The quarterly issues/programs list requirement, coupled with Commission review as necessary and public input at renewal time, has worked adequately over the past 25 years. The potential benefits, if any, of these unfunded mandatory proposals are severely outweighed by the costs involved. Instead, broadcasters should be given the flexibility, in their important role as stewards of the broadcast airwaves, to communicate with their communities in a manner that best suits the station and the community.

Remote Station Operation

For many years, broadcasters have been afforded the flexibility to operate without station personnel present at or near transmission facilities. This has been particularly important in emergency situations, where broadcaster resources may need to be devoted elsewhere. This Station opposes any efforts to remove the flexibility that the Commission has wisely provided to broadcasters. Many broadcasters simply cannot afford to staff their facility during all hours of operation and may be forced to shut down, which would be an extreme disservice to the public. Other broadcasters have invested thousands of dollars in technology to be sure we are immediately notified of any on-air problems. We don't believe the Commission should nullify those investments and require us to make even more expenditures for unneeded personnel

Main Studio Rule

Similarly, this Station opposes any restrictions to the main studio rule. For many years, stations have been given the choice as to where to locate their main studio in the communities they serve. Due to variations in topography, and in order to address the needs of the various communities they serve, broadcasters have been able to rely on the flexible approach the FCC has adopted. No changes to this flexible approach are necessary or warranted.

Voice-Tracking and National Playlists

This Station opposes any Commission regulation that would restrict the practice of voice-tracking. Voice-tracking can be a useful tool for smaller broadcasters to bring popular non-local talent to the local airwaves, as a benefit to their communities. Any restriction on this ability would be a disservice to the public, and any disclosure requirements potentially would infringe the First Amendment rights of broadcasters. Similarly, station playlists are a matter of licensees' discretion, and are tailored to serve the tastes of the communities they serve. The Commission is prohibited by statute from regulating the content of broadcast material, and should not encroach on the editorial freedoms broadcasters enjoy under the First Amendment.

License Renewal Procedures

Finally, the Commission has proposed the adoption of quotas for local programming. Such a proposal raises serious First Amendment concerns for broadcasters. Therefore, this Station opposes any government mandates in the form of quotas or specific minimum hours of local programming. Broadcasters who work and live in their local communities, and who inherently know the needs and interests their communities, are in the best position to determine how best to provide responsive programming, including local programming, and to allocate their resources accordingly. Broadcasters need the flexibility that is built into the current system. It is this flexibility that allows us to provide programming that best serves the public interest.

Everyone at our station is opposed to the localism issues currently being considered by the FCC. Not because it will place more burden on us to comply with unnecessary regulations, but because it will cause us to spend time performing duties that have no immediate benefit to our community. In order for us to continue to serve our community with local news, weather, coverage of football, baseball and basketball games, live broadcasts from the School Board and County Commissioners and local interest stories, we have to continue to have the freedom to operate our station remotely, use satellite delivered programming and many other tools that would be eliminated in these proposals. Please help us save small town radio. Please DO NOT institute these new Broadcast Localism requirements.

Respectfully,

A handwritten signature in black ink, appearing to read 'Jeffrey S. Lovett', with a long horizontal flourish extending to the right.

Jeffrey S. Lovett
General Manager

Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233

Received & Inspected

MAR 25 2008

FCC Mail Room

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We urge the FCC not to adopt rules, procedures or policies discussed above.

Wayne H. Abbott
Barbara Jo Abbott

Signature

Wayne H. Abbott
Barbara Jo Abbott

Name

Title (if any)

Organization (if any)

Date

3-17-08
5348 William Earl Way
Gloucester, VA 23061

Address

804-693-6923

Phone

Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233

MAR 25 2008

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We urge the FCC not to adopt rules, procedures or policies discussed above.

Judy C. Koon
Signature

3-19-08
Date

Judy C. Koon
Name

443 Old Fort Dr.
Address

Ladson SC 29456
Phone

Title (if any)

Organization (if any)

MAR 25 2008

Comments in Response to Localism-Notice of Proposed Rulemaking
MB Docket No. 04-233

FCC Mail Room

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Cecil E. Crawford

Signature

Mar 18, 2008

Date

Pauline Crawford

Name

344 Tumbling Brook Dr. - Banner Elk, NC

Address

28604

828-898-9827

Phone

Title (if any)

Organization (if any)

P.S. My question is: why would you ever consider such proposals?
 off it "air" brake, don't fix it. I've heard of no one being
 discriminated against!